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6 Attorneys for Defendants
7 Dreamdealers USA, LLC d/b/a Exotics Racing,
David Perisset, and Roman Thievin
8

9 UNITED STATES DISTRICT COURT

10 DISTRICT OF NEVADA

11 EDWARD B. DOUGLAS, an individual,
12 Plaintiffs,

13 vs.

14 DREAMDEALERS USA, LLC d/b/a
15 EXOTICS RACING, A Nevada limited
liability company, DAVID PERISSET, an
16 individual, and ROMAN THIEVIN, an
individual,

17 Defendant.

18 Case No. 2:17-cv-02134-APG-BNW

19 **STIPULATION AND ORDER AWARDING
FEES AND COSTS TO DEFENDANTS**

20 Plaintiff EDWARD B. DOUGLAS (“Plaintiff”) and Defendants DREAMDEALERS USA,
21 LLC D/B/A EXOTICS RACING, DAVID PERISSET, AND ROMAN THIEVIN (“Defendants”),
22 by and through their undersigned counsel, hereby agree and stipulate to award fees and costs to
Defendants in the amount of \$7,020.00.

23 On February 26, 2020, the Court held a hearing regarding Defendants’ Motion to Compel
24 Discovery (ECF No. 50) and Motion to Re-Open Discovery (ECF No. 51). In ruling upon said
25 Motions, the Court ordered Plaintiff to pay reasonable attorneys’ fees and costs to Defendants in
connection with the filing of said Motions. (ECF No. 68, Minutes of Proceedings; Transcripts of
Proceedings at 18:15-23). The Court further ordered the parties to meet and confer regarding what

1 constitutes reasonable attorneys' fees. (Transcripts of Proceedings at 18:15-23). The parties have
2 done so and have agreed that \$7,020.00 is reasonable. The parties have further agreed that Plaintiff
3 shall pay this amount within thirty days of the entry of this Order Awarding Fees and Costs to
4 Defendants.

5 Therefore, the parties stipulate and request that an award of \$7,020.00 be awarded as
6 reasonable attorneys' fees and costs, and that Plaintiff pay this amount to Defendants within thirty
7 days of the entry of this Order.

8 Dated: May 5, 2020

Dated: May 5, 2020

9 Respectfully submitted,

Respectfully submitted,

11 */s/ Dustin Clark*

12 DUSTIN L. CLARK, ESQ.
HOLLEY DRIGGS

13 Attorney for Plaintiff

11 */s/ Marcus B. Smith*

12 WENDY M. KRINCEK, ESQ.
MARCUS B. SMITH, ESQ.
LITTLER MENDELSON, P.C.

13 Attorneys for Defendants

15 **ORDER**

16 **IT IS SO ORDERED.**

17 Dated: May 6, 2020.

19 
20 _____
21 UNITED STATES MAGISTRATE JUDGE

22 4825-5365-0107.1 087825.1002